

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

HANNAH CRAMER, et al.,

Plaintiffs,

v.

ARKESIA, INC. d/b/a CLUB ROUGE, et al.,

Defendants.

Case No. 3:18-cv-00039

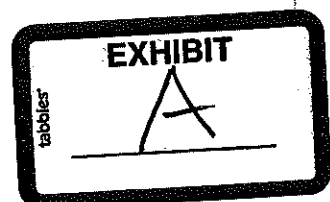
DECLARATION OF TROY POTEET

I, Troy Poteet, do hereby declare and affirm as follows:

1. My name is Troy Poteet, and I am over twenty-one (21) years of age, have never been convicted of a felony, and am otherwise fully competent to make this affidavit and to testify in any court of law. The facts set forth herein are true and correct and based upon my personal knowledge.

2. I am a resident of the Commonwealth of Virginia.

3. I am an Area Supervisor for Pyliaris Corporation, located at 218 East Main Street, Richmond, Virginia 23219, as an Area Supervisor. Pyliaris Corporation is a company which provides consulting and management services to Arkesia, Inc.; Circle 2, Inc. d/b/a Daddy Rabbits; Circle 2, Inc. d/b/a Candy Bar; Imaginary Images, Inc.; BTF3 LLC; and M.G.B., Inc. d/b/a Pure Pleasure. My job duties include contract procurement including final review and/or execution of contracts on behalf of the managed companies. Imaginary Images, Inc. and BTF3 LLC were purchased by William Pyliaris in mid-2017, and prior to that time were owned and operated by different individuals.



4. On August 25, 2015, Ms. Hannah Cramer signed a Performer Relationship Selection Agreement. A true copy of the Performer Relationship Selection Agreement is attached hereto as Exhibit 1.

5. On or about August 25, 2015, Ms. Cramer signed a Performer License and Temporary Space Lease Agreement. A true copy of the Performer License and Temporary Space Lease Agreement is attached hereto as Exhibit 2.

6. On or about October 12, 2015, Ms. Kristen Conner signed a Performer Relationship Selection Agreement. A true copy of the Performer Relationship Selection Agreement is attached hereto as Exhibit 3.

7. On or about October 12, 2015, Ms. Conner signed a Performer License and Temporary Space Lease Agreement. A true copy of the Performer License and Temporary Space Lease Agreement is attached hereto as Exhibit 4.

8. On or about January 7, 2016, Ms. Deanna Rose, now legally known as Deanna Danger, signed a Performer Relationship Selection Agreement. A true copy of the Performer Relationship Selection Agreement is attached hereto as Exhibit 5.

9. On or about January 7, 2016, Ms. Rose signed a Performer License and Temporary Space Lease Agreement. A true copy of the Performer License and Temporary Space Lease Agreement is attached hereto as Exhibit 6.

10. On or about February 8, 2018, Ms. Emily Lacuesta signed a Business Status Selection by Entertainer and Offer of Employment. A true copy of the Business Status Selection by Entertainer and Offer of Employment is attached hereto as Exhibit 7.

11. On or about February 8, 2018, Ms. Lacuesta signed an Entertainer Licensing Agreement. A true copy of the Entertainer Licensing Agreement is attached hereto as Exhibit 8.

12. On or about April 20, 2015, Ms. Ashley Cook signed a Performer Relationship Selection Agreement. A true copy of the Performer Relationship Selection Agreement is attached hereto as Exhibit 9.

13. On or about April 20, 2015, Ms. Ashley Cook signed a Performer License and Temporary Space Lease Agreement. A true copy of the Performer License and Temporary Space Lease Agreement is attached hereto as Exhibit 10.

14. Subsequently, on or about February 22, 2018, Ms. Ashley Cook signed a Business Status Selection by Entertainer and Offer of Employment. A true copy of the Business Status Selection by Entertainer and Offer of Employment is attached hereto as Exhibit 11.

15. On or about February 22, 2018, Ms. Ashley Cook signed an Entertainer Licensing Agreement. A true copy of the Entertainer Licensing Agreement is attached hereto as Exhibit 12.

16. On or about April 17, 2015, Ms. Brianna Hall signed a Performer Relationship Selection Agreement. A true copy of the Performer Relationship Selection Agreement is attached hereto as Exhibit 13.

17. On or about April 17, 2015, 2015, Ms. Hall signed a Performer License and Temporary Space Lease Agreement. A true copy of the Performer License and Temporary Space Lease Agreement is attached hereto as Exhibit 14.

18. Subsequently, on or about October 5, 2015, Ms. Brianna Hall signed a Performer Relationship Selection Agreement. A true copy of the Performer Relationship Selection Agreement is attached hereto as Exhibit 15.

19. On or about October 5, 2015, Ms. Hall signed a Performer License and Temporary Space Lease Agreement. A true copy of the Performer License and Temporary Space Lease Agreement is attached hereto as Exhibit 16.

20. On or about February 16, 2016, Ms. Deslie Crumpton signed a Performer Relationship Selection Agreement. A true copy of the Performer Relationship Selection Agreement is attached hereto as Exhibit 17.

21. On or about February 16, 2016, Ms. Crumpton signed a Performer License and Temporary Space Lease Agreement. A true copy of the Performer License and Temporary Space Lease Agreement is attached hereto as Exhibit 18.

22. On or about September 15, 2014, Ms. Mary Jo Bell signed a Performer Relationship Selection Agreement. A true copy of the Performer Relationship Selection Agreement is attached hereto as Exhibit 19.

23. On or about September 15, 2014, Ms. Bell signed a Performer License and Temporary Space Lease Agreement. A true copy of the Performer License and Temporary Space Lease Agreement is attached hereto as Exhibit 20.

24. Subsequently, on or about February 8, 2018, Ms. Bell signed a Performer Relationship Selection Agreement. A true copy of the Performer Relationship Selection Agreement is attached hereto as Exhibit 21.

24. On or about February 8, 2018, Ms. Bell signed an Arbitration Agreement. A true copy of the Arbitration Agreement is attached hereto as Exhibit 22.

26. On or about August 4, 2015, Ms. Kristi McPherson signed a Performer Relationship Selection Agreement. A true copy of the Performer Relationship Selection Agreement is attached hereto as Exhibit 23.

27. On or about August 4, 2015, Ms. McPherson signed a Performer License and Temporary Space Lease Agreement. A true copy of the Performer License and Temporary Space Lease Agreement is attached hereto as Exhibit 24.

28. On or about January 13, 2016, Ms. Meghan Musto signed a Performer Relationship Selection Agreement. A true copy of the Performer Relationship Selection Agreement is attached hereto as Exhibit 25.

29. On or about January 13, 2016, Ms. Musto signed a Performer License and Temporary Space Lease Agreement. A true copy of the Performer License and Temporary Space Lease Agreement is attached hereto as Exhibit 26.

30. On or about February 23, 2018, Ms. Musto signed a Business Status Selection by Entertainer and Offer of Employment. A true copy of the Business Status Selection by Entertainer and Offer of Employment is attached hereto as Exhibit 27.

31. On or about February 23, 2018, Ms. Musto signed an Entertainer Licensing Agreement. A true copy of the Entertainer Licensing Agreement is attached hereto as Exhibit 28.

32. On or about March 13, 2018, Ms. Musto signed a Business Status Selection by Entertainer and Offer of Employment. A true copy of the Business Status Selection by Entertainer and Offer of Employment is attached hereto as Exhibit 29.

33. On or about March 13, 2018, Ms. Musto signed an Entertainer Licensing Agreement. A true copy of the Entertainer Licensing Agreement is attached hereto as Exhibit 30.

34. On or about February 9, 2018, Ms. Rachael Altice signed a Business Status Selection by Entertainer and Offer of Employment. A true copy of the Business Status Selection by Entertainer and Offer of Employment is attached hereto as Exhibit 31.

35. On or about February 9, 2018, Ms. Altice signed an Entertainer Licensing Agreement. A true copy of the Entertainer Licensing Agreement is attached hereto as Exhibit 32.

36. On or about February 8, 2018, Ms. Sarah Darby signed a Business Status Selection by Entertainer and Offer of Employment. A true copy of the Business Status Selection by Entertainer and Offer of Employment is attached hereto as Exhibit 33.

37. On or about February 8, 2018, Ms. Darby signed an Entertainer Licensing Agreement. A true copy of the Entertainer Licensing Agreement is attached hereto as Exhibit 34.

38. On or about April 2, 2018, Ms. Julee N. Harris signed a Business Status Selection by Entertainer and Offer of Employment. A true copy of the Business Status Selection by Entertainer and Offer of Employment is attached hereto as Exhibit 35.

39. On or about April 2, 2018, Ms. Julee N. Harris signed an Entertainer Licensing Agreement. A true copy of the Entertainer Licensing Agreement is attached hereto as Exhibit 36.

40. On or about March 19, 2018, Ms. Samantha Henshaw signed a Business Status Selection by Entertainer and Offer of Employment. A true copy of the Business Status Selection by Entertainer and Offer of Employment is attached hereto as Exhibit 37.

41. On or about March 19, 2018, Ms. Henshaw signed an Entertainer Licensing Agreement. A true copy of the Entertainer Licensing Agreement is attached hereto as Exhibit 38.

42. On or about February 9, 2018, Ms. Breanna Holt signed a Business Status Selection by Entertainer and Offer of Employment. A true copy of the Business Status Selection by Entertainer and Offer of Employment is attached hereto as Exhibit 39.

43. On or about February 9, 2018, Ms. Holt signed an Entertainer Licensing Agreement. A true copy of the Entertainer Licensing Agreement is attached hereto as Exhibit 40.

44. On January 31, 2018, Ms. Sharita Johnson signed a Performer Relationship Selection Agreement. A true copy of the Performer Relationship Selection Agreement is attached hereto as Exhibit 41.

45. On the Performer Relationship Selection Agreements, Ms. Johnson signed her name as "Rita Johnson." When she signed the agreement, a copy of her Virginia driver's license was made, which shows that her legal name is "Sharita Johnson." A true copy of Ms. Johnson's Driver's License is attached hereto as Exhibit 42.

46. On January 31, 2018, Ms. Johnson signed an Arbitration Agreement. A true copy of the Arbitration Agreement is attached hereto as Exhibit 43.

47. On or about February 8, 2018, Ms. Fannie Reckard signed a Business Status Selection by Entertainer and Offer of Employment. A true copy of the Business Status Selection by Entertainer and Offer of Employment is attached hereto as Exhibit 44.

48. On or about February 8, 2018, Ms. Reckard signed an Entertainer Licensing Agreement. A true copy of the Entertainer Licensing Agreement is attached hereto as Exhibit 45.

49. On or about February 18, 2018, Ms. Christyanne Siller signed a Business Status Selection by Entertainer and Offer of Employment. A true copy of the Business Status Selection by Entertainer and Offer of Employment is attached hereto as Exhibit 46.

50. On or about February 18, 2018, Ms. Siller signed an Entertainer Licensing Agreement. A true copy of the Entertainer Licensing Agreement is attached hereto as Exhibit 47.

51. On or about February 8, 2018, Ms. Jessica Wilson signed a Business Status Selection by Entertainer and Offer of Employment. A true copy of the Business Status Selection by Entertainer and Offer of Employment is attached hereto as Exhibit 48.

52. On or about February 8, 2018, Ms. Jessica Wilson signed an Entertainer Licensing Agreement. A true copy of the Entertainer Licensing Agreement is attached hereto as Exhibit 49.

53. On or about February 25, 2018, Ms. Rachel Wilson signed a Business Status Selection by Entertainer and Offer of Employment. A true copy of the Business Status Selection by Entertainer and Offer of Employment is attached hereto as Exhibit 50.

54. On or about February 25, 2018, Ms. Rachel Wilson signed an Entertainer Licensing Agreement. A true copy of the Entertainer Licensing Agreement is attached hereto as Exhibit 51.

55. On or about September 9, 2014, Ms. Amanda Coleman signed a Performer Relationship Selection Agreement. A true copy of the Performer Relationship Selection Agreement is attached hereto as Exhibit 52.

56. On or about September 9, 2014, Ms. Amanda Coleman signed a Performer License and Temporary Space Lease Agreement. A true copy of the Performer License and Temporary Space Lease Agreement is attached hereto as Exhibit 53.

57. On or about December 26, 2014, Ms. Melissa Herring signed a Performer Relationship Selection Agreement. A true copy of the Performer Relationship Selection Agreement is attached hereto as Exhibit 54.



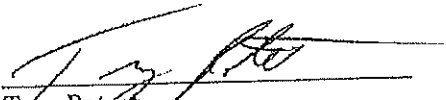
58. On or about December 27, 2014, Ms. Herring signed a Performer License and Temporary Space Lease Agreement. A true copy of the Performer License and Temporary Space Lease Agreement is attached hereto as Exhibit 55.

59. On or about December 25, 2014, Katherine Antle signed a Performer Relationship Selection Agreement. A true copy of the Performer Relationship Selection Agreement is attached hereto as Exhibit 56.

60. On or about December 25, 2014, Ms. Antle signed and a Performer License and Temporary Space Lease Agreement. A true copy of the Performer License and Temporary Space Lease Agreement is attached hereto as Exhibit 57.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 13 day of April, 2018, in Richmond, Virginia.

  
Troy Poter